

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

UNITED STATES OF AMERICA

3:22-CR-435-MO

v.

INDICTMENT

WILLIAM CAMERON KROUTH

21 U.S.C. § 841(a)(1), (b)(1)(A), (b)(1)(B),
18 U.S.C. § 924(c)

Defendant.

Forfeiture Allegations

THE GRAND JURY CHARGES:

COUNT 1

(Possession with the Intent to Distribute Methamphetamine)
(21 U.S.C. § 841(a)(1), (b)(1)(A))

On or about December 6, 2022, in the District of Oregon, **WILLIAM CAMERON KROUTH**, defendant herein, did knowingly and intentionally possess with the intent to distribute five hundred grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A)(viii).

COUNT 2

(Possession with the Intent to Distribute Heroin)
(21 U.S.C. § 841(a)(1) and (b)(1)(A))

On or about December 6, 2022, in the District of Oregon, **WILLIAM CAMERON KROUTH**, defendant herein, did knowingly and intentionally possess with the intent to

distribute one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance;

In violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A)(i).

COUNT 3
(Possession with the Intent to Distribute Fentanyl)
(21 U.S.C. § 841(a)(1), (b)(1)(A))

On or about December 6, 2022, in the District of Oregon, **WILLIAM CAMERON KROUTH**, defendant herein, did knowingly and intentionally possess with the intent to distribute 400 grams or more of a mixture or substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, a Schedule II controlled substance;

In violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A)(vi).

COUNT 4
(Possession with the Intent to Distribute Cocaine)
(21 U.S.C. § 841(a)(1), (b)(1)(B))

On or about December 6, 2022, in the District of Oregon, **WILLIAM CAMERON KROUTH**, defendant herein, did knowingly and intentionally possess with the intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B)(ii).

COUNT 5
(Possession of Firearm in Furtherance of a Drug Trafficking Crime)
(18 U.S.C. § 924(c)(1)(A))

On or about December 6, 2022, in the District of Oregon, **WILLIAM CAMERON KROUTH**, defendant herein, did knowingly possess the following firearms to wit: a 12 gauge shotgun bearing serial number 635H21HB332; a Palmeto AR-15 bearing serial number

SCD789887; an XTM .22 caliber handgun bearing serial number XTM012045; a Glock 9mm handgun bearing serial number ADL357; an AA Arms handgun bearing serial number AP9055420; a .45 caliber handgun bearing serial number K579372; and a SCCY Industries 9mm CPX-2 bearing serial number 659716, all in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is possession with the intent to distribute the controlled substances as alleged in Counts 1, 2, 3, and 4 of this indictment;

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

FIRST FORFEITURE ALLEGATION

Upon conviction of any of the controlled substance offenses as alleged in Counts 1, 2, 3, and 4 of this indictment **WILLIAM CAMERON KROUTH**, defendant herein, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of the said violations and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of said violations, including but not limited to the following:

A money judgment for a sum of money equal to the amount of property representing the amount of proceeds obtained as a result of the controlled substances distributed as alleged in Counts 1, 2, 3, and 4 of the indictment for which the defendant is jointly and severally liable.

If any of the above-described forfeitable property, as a result, of any act or omission of the defendants:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or

(5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b), to seek forfeiture of any other property of said defendants up to the value of the forfeitable property described above.

SECOND FORFEITURE ALLEGATION

Upon conviction for the offense in Count 5 of this indictment, **WILLIAM CAMERON KROUTH**, defendant herein, shall forfeit to the United States pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), the firearms and ammunition involved in those offense, including without limitation:

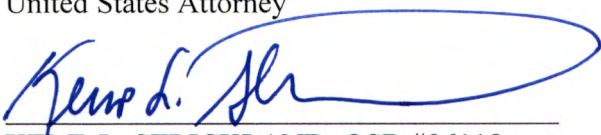
- 1) a 12-gauge shotgun bearing serial number 635H21HB332;
- 2) a Palmeto AR-15 bearing serial number SCD789887;
- 3) a XTM .22 caliber handgun bearing serial number XTM012045;
- 4) a Glock 9mm handgun bearing serial number ADL357;
- 5) a AA Arms handgun bearing serial number AP9055420;
- 6) a .45 caliber handgun bearing serial number K579372; and
- 7) a SCCY Industries 9mm CPX-2 bearing serial number 659716.

Dated December 13th, 2022.

A TRUE BILL.


OFFICIATING FOREPERSON

Presented by:
NATALIE K. WIGHT
United States Attorney


KEMP L. STRICKLAND, OSB #96118
Assistant United States Attorney